

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

WILLIE DALE FOULKS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:09-CV-00047-LMB
)	
JUSTIN DEAN WATSON,)	
)	
Defendant.)	

DEFENDANT’S WITNESS AND EXHIBIT LIST

COMES NOW Defendant Watson, by and through counsel, Assistant Attorney General Ted Bruce, and submits the following list of witnesses and exhibits for trial:

Witnesses

The Defendant will call:

1. Defendant Justin Watson
2. Rick Plunk

The Defendant may call:

3. Larry White
4. Marsha Tackett

Exhibit List

- A-1 Advanced Healthcare Record: Initial Evaluation dated February 9, 2007
- A-2 Advanced Healthcare Record: Follow-up Visit dated February 22, 2007
- A-3 Advanced Healthcare Record: Follow-up Visit dated October 12, 2009
- A-4 Advanced Healthcare Record: Follow-up Visit dated March 16, 2005

- A-5 Advanced Healthcare Record: Follow-up Visit: Amy Holland – dated August 12, 2005
- A-6 Advanced Healthcare Record: Follow-up Visit dated May 11, 2004
- A-7 Advanced Healthcare Record: Follow-up Visit dated April 30, 2004
- A-8 Advanced Healthcare Record: Follow-up Visit dated April 24, 2004
- B-1 Ripley County Memorial Hospital: ER – Dr. Ramasamy – dated April 24, 2004
- B-2 Ripley County Memorial Hospital: ER – Dr. Ramasamy – dated April 25, 2004
- B-3 Ripley County Memorial Hospital: ER – Dr. Ramasamy – dated April 25, 2004
- B-4 Ripley County Memorial Hospital: ER – Dr. Ramasamy – dated April 25, 2004
- B-5 Ripley County Memorial Hospital: ER – dated April 24, 2004
- B-6 Ripley County Memorial Hospital: ER – dated April 24, 2004
- C-1 Lamoureux Chiropractic Clinic: Visit dated May 28, 1992
- C-2 Lamoureux Chiropractic Clinic: Correspondence dated February 12, 1993
- C-3 Lamoureux Chiropractic Clinic: Visit dated October 3, 1996
- C-4 Lamoureux Chiropractic Clinic: Report dated October 7, 1996
- C-5 Lamoureux Chiropractic Clinic: Visit dated January 16, 2003
- C-6 Lamoureux Chiropractic Clinic: Self-Report dated (January) 2003
- C-7 Lamoureux Chiropractic Clinic: Self-Report dated June 3, 2003
- C-8 Lamoureux Chiropractic Clinic: Correspondence dated June 17, 2003
- C-9 Lamoureux Chiropractic Clinic: Report dated December 9, 2003
- C-10 Lamoureux Chiropractic Clinic: Patient Notes (4/9/91 – 4/13/92)
- D-1 Neurosurgical Associates of Northeast Arkansas: Visit dated January 9, 2007

- D-2 Neurosurgical Associates of Northeast Arkansas: Visit dated January 9, 2007
- E-1 Cape Neurosurgical Associates, PC: Follow-Up Visit dated July 27, 2004
- E-2 Cape Neurosurgical Associates, PC: Initial Visit dated May 27, 2004
- E-3 Cape Neurosurgical Associates, PC: Follow-Up Visit dated August 23, 2005
- E-4 Cape Neurosurgical Associates, PC: Past Medical History
- E-5 Cape Neurosurgical Associates, PC: Report dated May 4, 2004
- E-6 Cape Neurosurgical Associates, PC: Visit dated November 3, 2005
- F-1 Lamoureux Chiropractic Centre: Patient Notes (04/09/91 – 04/13/92)
- F-2 Lamoureux Chiropractic Centre: Patient Notes (04/09/91 – 04/13/92)
- F-3 Lamoureux Chiropractic Centre: Patient Notes (04/15/92 – 06/23/95)
- F-4 Lamoureux Chiropractic Centre: Patient Notes (06/26/96 – 11/07/98)
- F-5 Lamoureux Chiropractic Centre: Patient Notes (11/07/00 – 04/09/03)
- F-6 Lamoureux Chiropractic Centre: Patient Notes (04/10/03 – 08/06/03)
- F-7 Lamoureux Chiropractic Centre: Patient Notes (08/13/03 – 02/15/05)
- G Dr. David Yingling: Follow-up Visit dated August 23, 2005
- H Dr. Todd Stewart: Consultation dated December 13, 2004
- I Dr. Gibbs' report dated May 7, 2010
- J-1 Dr. Gibbs' report dated February 13, 2009
- J-2 Dr. Gibbs' report dated February 13, 2009
- J-3 St. Francis Medical Center – Operation Record dated November 19, 2007
- J-4 Radiology Report: Dr. Sunjay Fonn – dated February 16, 2009
- J-5 Dr. Annamarie Guidos Report dated February 27, 2009

- J-6 Dr. Gibbs' report dated March 11, 2009 (2 pgs.)
- J-7 Dr. Gibbs' report dated March 17, 2009
- J-8 Dr. Gibbs' report dated March 17, 2009
- J-9 Dr. Gibbs – Operation Report dated April 22, 2009
- J-10 Dr. Gibbs' report dated May 1, 2009
- J-11 Dr. Gibbs' report dated June 10, 2009
- J-12 Dr. Gibbs' report dated April 9, 2010
- J-13 Dr. Gibb's report dated Feb. 13, 2009
- K Chiropractor's History and notes
- L Video of car stop, April 24, 2004
- M Video of initial entry into Jail, April 24, 2004
- N Video of Plaintiff in Jail cell, April 24, 2004
- O Video of Plaintiff's release from jail, April 24, 2004
- P Plaintiff's answers to interrogatories
- Q Plaintiff's income summary, 2003-2009
- R Plaintiff's temporary driver's license.
- S Handcuffs
- T Report of Larry White, April 19, 2004
- U Report of Larry White, September 15, 2003
- V Report of Ben Gall, March 5, 2003
- W Report of Mark Capps, November 1, 2001
- X Judgment of December 22, 2003

- Y Alcohol influence report, March 2003
- Z Section 575.150, RSMo.
- AA DOR letter regarding reinstatement of license

Respectfully submitted,

CHRIS KOSTER
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/s/ Theodore A. Bruce

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

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